



## Department of Energy

Washington, DC 20585

August 5, 2005

The Honorable A. J. Eggenberger  
Chairman  
Defense Nuclear Facilities Safety Board  
625 Indiana Avenue, NW, Suite 700  
Washington, DC 20004

Dear Mr. Chairman:

As called for by Commitment 21 in the Department's 2004-1 implementation plan, this letter provides the Department's decision and basis on whether to issue the Department's Integrated Safety Management (ISM) vision (described in Appendix F of the Department's 2004-1 Implementation Plan) as a complementary ISM Policy or Notice. The Department has carefully considered this matter and has decided that the issuance of a complementary ISM policy or notice is not necessary or desirable at this time. The Department's ISM vision has been clearly defined and communicated in the 2004-1 implementation plan, approved by the Secretary on June 10, 2005. This vision is being reinforced through ongoing dialogue with responsible managers throughout the Department, as demonstrated by the attached internal memo.

As described in the 2004-1 implementation plan, the Department's first formal step within the Directives system will be to establish clear requirements for federal offices to develop and implement ISM systems. Commitment 22 calls for a new ISM manual, containing these expectations, to be issued by December 2005. Ultimately, as described in the Implementation Plan, all ISM directives, including the ISM policy, ISM guide, Team leader's handbook, and ISM DEAR clause, will be reviewed and upgraded as necessary, to make them consistent with the ISM manual and to reflect ongoing learning about how to effectively implement ISM. The plan calls for the full suite of ISM directives to be reviewed after at least one year of experience is gained in meeting the new ISM expectations, as contained in the ISM manual. This remains the Department's plan and path forward on ISM directives.

The current ISM policy (Guiding Principles and Functions) is firmly established within the DOE complex. Feedback from the field, most recently during review of Appendix F of the 2004-1 Implementation Plan, indicates that any change to the ISM policy requires a thoughtful and deliberate approach. The approach described in the 2004-1 Implementation Plan will allow for directed evolution of the Department's ISM systems, without over-specifying the form and content of these systems. Lessons learned during implementation of the ISM manual can be reflected in the revision to other ISM directives. Ultimately, it appears highly likely that the current ISM policy (DOE P 450.4) will need to be revised to be consistent with the Department's expanded ISM vision. The updated vision is fundamentally consistent with the current ISM policy; the changes are mostly related to extending and emphasizing portions of the original vision. Hence, it is



unnecessary to change the ISM policy at this time and it can be done more efficiently and effectively later, as necessary, after implementation experience is gained and the vision can be honed for institutionalization.

Please provide any further feedback to me at (202) 586-2550, or have your staff provide feedback to the 2004-1 project leader, Ms. Kim Davis, at (202) 586-3771.

Sincerely,

  
Bruce M. Carnes  
Associate Deputy Secretary

cc: Mark B. Whitaker, Jr., DR-1  
Jerry Paul, NA-2  
David Garman, US-ESE  
John Shaw, EH-1